

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

John Doe.

Plaintiff,

Case No. 2:21-cv-20706

v.

Baila Sebrow

Defendant

**AFFIDAVIT OF SERVICES PURSUANT TO UNITED STATE MAGISTRATE JUDGE
EDWARD S. KIEL'S DECEMBER 21, 2022, ORDER**

1. I am a partner at the law firm of Borenstein, McConnell & Calpin, P.C., co-counsel for Plaintiff. I make this declaration pursuant to the Court's December 21, 2022 Order.

2. I was admitted to practice in the States of New York in 1975 and New Jersey in 1979. I have practiced law continuously since then. I have handled (argued and tried) complex litigation matters in New York, New Jersey and across the United States.

3. I have been responsible for reviewing the time records in this case from its inception to the present. I am familiar with the activities that the attorneys and staff have performed in representing the plaintiff. I am also familiar with the time and cost of those activities.

4. Over the course of this litigation, my customary hourly billing rate is \$600.00. However, I have agreed to reduce my rate to \$500.00 for the purposes of this matter.

5. To date, I have billed Plaintiff 10 hours to prepare for the settlement conference, meet with the client in person and by phone and electronically multiple times, regarding the conference, review and edit my co-counsel's memorandum, and have had various other

conversations with Plaintiff regarding the conference for a total of \$5,000.00. I have had many conversations with co-counsel but have not billed for them in this certification.

6. The rates charged by each attorney were the customary and normal rates charged to other clients at the times each of the services were performed. Attorneys at my level of skill and experience customarily charge between \$600-\$800 per hour. I am charging, as stated, \$500 per hour. Because my billing rates are based on market conditions, I believe that the rates we charged reflect rates for similarly qualified attorneys in New Jersey.

7. Had I not been representing Plaintiff in this matter, I would have been fully utilized on other billable client work.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: December 28, 2022
Springfield, New Jersey

/s/ Abraham Borenstein
By: Abraham Borenstein, Esq.